

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE:**

**WC 717 N HARWOOD PROPERTY,  
LLC**

**Debtor.**

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**CASE NO. 21-10630 (TMD)  
(Chapter 7)**

**COLLIERS INTERNATIONAL NORTH TEXAS, LLC’S APPLICATION FOR  
ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE EXPENSE CLAIM**

Colliers International North Texas, LLC (“Colliers”), submits this Application for Allowance of Chapter 11 Administrative Expense Claim (the “Application”) and, in support of its Application, shows:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§1334 and 157. This is a “core” proceeding pursuant to 28 U.S.C. §157(b). The statutory basis for relief is 11 U.S.C. §§105 and 503.

**BACKGROUND**

2. On August 3, 2021 (the “Petition Date”), WC 717 N Harwood Property, LLC (the “Debtor”), initiated the above-captioned bankruptcy case (the “Bankruptcy Case”) by filing a voluntary petition for relief under Chapter 11 of the United States Code in the United States Bankruptcy Court for the Western District of Texas – Austin Division (the “Court”).<sup>1</sup>

3. On April 21, 2022 (the “Conversion Date”), the Court entered an order converting the Bankruptcy Case to a case under Chapter 7 of the Bankruptcy Code [Dkt. No. 149].

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<sup>1</sup> In Debtor’s list of its 20 largest unsecured creditors [Dkt. No. 21], Colliers is misnamed as “COLLIERS INTERNATIONAL HOLDINGS (USA) INC.” Per that list, Colliers is the Debtor’s largest, pre-Petition Date, unsecured creditor.

4. On May 31, 2022, the Court entered an Order Granting Trustee’s Motion for Entry of an Order: (I) Fixing Bar Date for Filing Chapter 11 Administrative Expense Claims; and (II) Approving the Form and Manner of Notice of the Bar Date [Dkt. No. 190]. That order, *inter alia*, defines “Chapter 11 Administrative [Expense] Claims” as “those claims pursuant to 11 U.S.C. §503 that arose between” the Petition Date and the Conversion Date.

### **RELIEF REQUESTED**

5. From May 2017 through April 17, 2022 (*i.e.*, before the Conversion Date),<sup>2</sup> Colliers provided property management services to the Debtor in accordance with a Management Agreement. *See* Exhibit A. Several of Colliers’ invoices to Debtor services rendered during the period between the Petition Date and April 17, 2022 remain unpaid. *See* Exhibit B. The sum of those unpaid amounts is \$39,205.80. *See* Exhibit C.

6. The services rendered by Colliers to Debtor during the period between the Petition Date and April 17, 2022, were necessary to preserve the Debtor’s estate and, therefore, are administrative expenses. 11 U.S.C. §503. Therefore, Colliers respectfully requests that the Court (a) grant this Application and (b) enter an order directing the Chapter 7 Trustee to pay Colliers the sum of \$39,205.80.

*[INTENTIONALLY BLANK]*

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<sup>2</sup> The following day, SKW – B Harwood Seller J, LLC (“SKW”), took possession of Debtor’s real property [Dkt. No. 142]. Colliers continues to manage such property under a separate Management Agreement with SKW, which commenced on April 18, 2022.

Respectfully submitted,

/s/ John M. Lynch

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### **CERTIFICATE OF SERVICE**

I hereby certify that I served this document on the Chapter 7 Trustee's counsel via email to the following addresses:

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DATED: July 11, 2022

/s/ John M. Lynch

John M. Lynch